

168



SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

1 JASON M. FRIERSON
United States Attorney
2 District of Nevada
Nevada Bar No. 7709
3 BIANCA R. PUCCI
Assistant United States Attorney
4 Nevada Bar No. 16129
501 Las Vegas Boulevard South, Suite 1100
5 Las Vegas, Nevada 89101
Tel: (702) 388-6336
6 Fax: (702) 388-6418
Bianca.Pucci@usdoj.gov
7 *Attorneys for the United States*

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
SEP 13 2023	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 SAMVEL ASOYAN,

14 Defendants.

SEALED

CRIMINAL INDICTMENT

Case No. 2:23-cr-0168-JCM-BNW

VIOLATIONS:

18 U.S.C. §§ 922(a)(6) and 924(a)(2) –
Illegal Acquisition of a Firearm

15 **THE GRAND JURY CHARGES THAT:**

16 **COUNTS ONE THROUGH TWENTY-TWO**

Illegal Acquisition of a Firearm

(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

18 On or about the dates below, in the State and Federal District of Nevada,

19 **SAMVEL ASOYAN,**

20 defendant herein, in connection with, as described below, the acquisition of firearms from
21 licensed dealers of firearms within the meaning of Chapter 44 of Title 18, United States
22 Code (the "Dealers"), knowingly made and caused to be made a false and fictitious
23 written statement to each of the Dealers, which statement was intended and likely to
24 deceive each of the Dealers as to a fact material to the lawfulness of the sale of said

firearm to the defendant under Chapter 44 of Title 18, United States Code, in that SAMVEL ASOYAN did complete and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein SAMVEL ASOYAN represented that he was a Nevada resident when in fact, and as the defendant well knew, he was a California resident:

COUNT	Purchase Date	FFL	Make	Model	Caliber	Serial Number
ONE	March 20, 2022	FFL-1	Glock	19	9mm	BUHL065
			Glock	45	9mm	BLLY168
TWO	May 20, 2022	FFL-2	Glock	43X	9mm	BWKT519
			Glock	43X	9mm	BWUT960
THREE	May 25, 2022	FFL-2	Beretta	84	.380	Y47324Y
FOUR	May 26, 2022	FFL-3	Colt	Govern-ment	.45	2812661
			Browning	High-power	9mm	69C4885
FIVE	August 12, 2022	FFL-3	Standard MFG	1911	.45	GVT001870
			Browning Arms	High-power	9mm	511MN50466
SIX	September 9, 2022	FFL-3	Glock	43X	9mm	AGMX672
SEVEN	October 15, 2022	FFL-4	Mauser-Werke AG Oberndorf A.N.	HSC	.380	4718

EIGHT	October 15, 2022	FFL-1	Glock	17 Gen 5	9mm	AGFY072
			Glock	43X	9mm	BXBX427
			Glock	43X	9mm	BXBX444
			Glock	19 Gen 5	9mm	BVUM505
			Glock	19	9mm	AFYD875
NINE	October 19, 2022	FFL-4	Beretta	85BB	.380	Y04938Y
TEN	October 19, 2022	FFL-2	Glock	43X	9mm	BXKH615
			Sig Sauer	365 XL	9mm	668899536
			Glock	43X	9mm	BXKH616
			Glock	45	9mm	BYCL639
ELEVEN	October 19, 2022	FFL-5	Smith & Wesson	M&P 9	9mm	SBF7914
TWELVE	October 28, 2022	FFL-6	Smith & Wesson	M&P 9	9mm	SBF7446
			Glock	19	9mm	AFSH840
			Glock	43X	9mm	BYBE081
THIRTEEN	December 10, 2022	FFL-3	FN	Hi Power	9mm	511MX70731
			Glock	43X	9mm	BXT0903
			Glock	43X	9mm	BVML617
			North American Arms	Pug	.22 mag	TQP00952
FOURTEEN	January 21, 2023	FFL-4	Smith & Wesson	39-2	9mm	A284027
FIFTEEN	February 4, 2023	FFL-4	FNH/ Browning Arms Company	BDA-380	.380	425PN06564

SIXTEEN	February 4, 2023	FFL-7	Smith & Wesson	M&P Bodyguard 380	.380	KJH0968
SEVENTEEN	February 17, 2023	FFL-1	Glock	19 Gen 5	9mm	BWYY058
			Glock	43X	9mm	BYXK321
EIGHTEEN	February 26, 2023	FFL-4	Sturm Ruger & Co.	MK II	.22	NRA-16463
NINETEEN	May 28, 2023	FFL-4	FI Brazil/ Springfield Inc.	None	.45	N347181
TWENTY	July 23, 2023	FFL-4	Smith & Wesson	36 Revolver	.38	760053
TWENTY-ONE	July 24, 2023	FFL-4	Colt	MKIV/ SERIES 70 Gold Cup	.45	07200N70
TWENTY-TWO	July 24, 2023	FFL-2	CZ	Shadow 2	9mm	G219913

all in violation of Title 18, United States Code, Sections 922(a)(6), and 924(a)(2).

FORFEITURE ALLEGATION

Illegal Acquisition of a Firearm

1. The allegations of Counts One through Twenty-Two of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture under 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts One through Twenty-Two of this Criminal Indictment,

SAMVEL ASOYAN,

defendant herein, shall forfeit to the United States of America, any firearm or ammunition involved in or used in any knowing violation of 18 U.S.C. § 922(a)(6):

1. Smith & Wesson, 36, .38 caliber revolver bearing serial number 760053;

2. Colt, MKIV/SERIES 70 Gold Cup, .45 caliber firearm bearing serial number 07200N70; and

3. any and all firearms or any and all compatible ammunition with the requisite nexus to violations of 18 U.S.C. § 922(a)(6) under 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c) and Fed. R. Crim. P. 32.2(b)(2)(C).

All under 18 U.S.C. § 922(a)(6) and 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c).

DATED: this 13th day of September, 2023.

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

JASON M. FRIERSON
United States Attorney



BIANCA R. PUCCI
Assistant United States Attorney